

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I  
ANALOG NTSC TV ALLOCATION SITUATION  
FOR THE PROPOSED DTV CHANNEL 34 OPERATION OF  
WSET-TV, LYNCHBURG, VIRGINIA  
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623 <sup>1</sup> km
DTV					
34	WSET-TV	Lynchburg, VA	37-18-52 <sup>2</sup> 79-38-04	--	--
ANALOG					
19		None within 125 km	--	--	24.1-96.6
20		None within 125 km	--	--	24.1-96.6
26		None within 125 km	--	--	24.1-96.6
27	WFXR-TV	Roanoke, VA	37-11-46 80-09-16	48	24.1-96.6
30		None within 125 km	--	--	24.1-96.6
31		None within 125 km	--	--	24.1-96.6
32	New	High Point, NC	36-08-58 80-03-21	134.6	24.1-96.6
33		None within 125 km	--	--	9.7-88.5
34	New	Raleigh, NC	35-40-35 78-32-08	206.7	244.6
35		None within 125 km	--	--	9.7-88.5
36		None within 125 km	--	--	24.1-96.6
37		None within 125 km	--	--	24.1-96.6
38	WEFC	Roanoke, VA	37-11-35 80-09-29	48.4	24.1-96.6
41	WHTJ	Charlottesville, VA	37-58-58 78-29-00	125.8	24.1-80.5
42		None within 125 km	--	--	24.1-96.6

<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.

<sup>2</sup>Licensed WSET-TV Site.

COHEN, DIPPELL AND EVERIST, P. C.

**TABLE II**  
**ANALOG NTSC TV ALLOCATION SITUATION**  
**FOR THE PROPOSED DTV CHANNEL 34 OPERATION OF**  
**WSET-TV, LYNCHBURG, VIRGINIA**  
**AUGUST 1997**

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Geographic Coordinates</u>	<u>Distance</u>	
				<u>Actual km</u>	<u>Section 73.623<sup>1</sup> km</u>
<u>DTV</u>					
34	WSET-TV	Lynchburg, VA	37-18-52 <sup>2</sup> 79-38-04	--	--
33	WUPN-TV	Greensboro, NC	35-52-13 79-50-25	161.3	32.2-88.5
34	WSOC-TV	Charlottesville, NC	35-15-41 80-43-38	248.1	223.7
35	WGHP-TV	High Point, NC	35-48-47 79-50-36	167.7	32.2-88.5

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<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.

<sup>2</sup>Licensed WSET-TV Site.

## **EXHIBIT 4**

**ENGINEERING STATEMENT  
RE REQUEST FOR CHANGE  
IN DTV CHANNEL ALLOTMENT AND  
ASSIGNED POWER AND ANTENNA HEIGHT  
WJSU-TV, ANNISTON, ALABAMA**

**AUGUST 1997**

**COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.**

This engineering statement has been prepared on behalf of RKZ Television, Inc., licensee of TV station WJSU-TV, Anniston, Alabama, in support of its request for a DTV channel which is part of the Commission's core spectrum for digital television operation. It is also requested that the Commission assign power and antenna height for the DTV operation to replicate station WJSU-TV's recently granted modified construction permit (BMPCT-970319KE) facilities.

At present, station WJSU-TV is licensed to operate on analog NTSC Channel 40 (626-632 MHz) with 724 kW effective radiated power (ERP) and 268 meters antenna height above average terrain (HAAT). WJSU-TV was granted a construction permit (BPCT-950808KF) to operate from an antenna site 47 kilometers southwest of the licensed site with 5000 kW ERP and 350 meters HAAT. The station's construction permit was recently modified (BMPCT-970319KE) to operate from an antenna site 56.4 kilometers west of the licensed site with 5000 kW ERP and 396 meters HAAT.

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station WJSU-TV was allotted UHF Channel 58 for its DTV operation. The Commission assigned 253.2 kW ERP and 350 meters antenna height to WJSU-TV for its DTV operation to replicate its construction permit (BPCT-950808KF) facilities. However, since WJSU-TV will be constructing its analog NTSC facilities at the modified CP site, it is requested that the

Commission assign DTV power and antenna height to replicate the modified WJSU-TV analog NTSC facilities.

In Sixth Report and Order, the Commission also indicated that the core spectrum for DTV operation would be either Channels 2-46 or channels 7-51. The Commission stated that it will monitor the testing and early implementation of DTV systems to decide the final core spectrum for the digital TV operation. The proposed DTV Channel 58 allotted to WJSU-TV falls outside the core spectrum being considered for DTV operation. Therefore, WJSU-TV requests the Commission to allot the station a DTV channel which is part of its core spectrum plan so that its DTV operation does not require a change in frequency after the transition period.

An engineering study was conducted to determine another suitable DTV channel, located in the core-spectrum, which would replicate the modified analog CP facilities and also not result in any predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The study indicates UHF Channel 47 can be allotted to WJSU-TV in lieu of Channel 58 for its DTV operation. The attached Tables I and II list the pertinent analog and DTV stations, respectively, which were considered for the allotment of DTV Channel 47 to WJSU-TV. These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would

not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed DTV Channel 47 operation at the modified WJSU-TV site.

There is only one co-channel analog NTSC operation on Channel 47 which is located within 500 kilometers of the WJSU-TV modified CP site. A new analog operation on Channel 47 has been proposed at Hattiesburg, Mississippi which is located 373.7 kilometers from the WJSU-TV site. The nearest co-channel DTV allotments are located at Chattanooga, Tennessee (WDEF-TV), 197.1 kilometers and Columbus, Georgia (WTVM), 209.0 kilometers from the WJSU-TV site.

Although some interference is predicted to other analog TV stations and the proposed DTV allotments, it is believed that such predicted interference falls within the acceptable range of the DTV allotment process. The Commission itself has allotted DTV channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of WJSU-TV, was not considered excessive.

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ENGINEERING STATEMENT  
WJSU-TV, ANNISTON, ALABAMA

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It is estimated that Channel 47 DTV operation with approximately 220 kW ERP and 396 meters HAAT would replicate the modified analog NTSC facilities of WJSU-TV.

Respectfully submitted,



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Sudhir K. Khanna  
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Professional Engineer  
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COHEN, DIPPELL AND EVERIST, P. C.

**TABLE I**  
**ANALOG NTSC TV ALLOCATION SITUATION**  
**FOR THE PROPOSED DTV CHANNEL 47 OPERATION OF**  
**WJSU-TV, ANNISTON, ALABAMA**  
**AUGUST 1997**

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623 <sup>1</sup> km
DTV					
47	WJSU-TV	Anniston, AL	33-36-24 <sup>2</sup> 86-25-03	--	--
ANALOG					
32	None within 130 km		--	--	24.1-96.6
33	WCFT-TV	Tuscaloosa, AL	33-28-48 87-25-50	95.1	24.1-96.6
39	New	Tuscaloosa, AL	33-28-51 87-24-03	92.4	24.1-96.6
40	WJSU-TV	Anniston, AL	33-36-24 86-25-03	0	24.1-96.6
43	None within 130 km		--	--	24.1-96.6
44	WNAL-TV	Gadsden, AL	33-53-27 86-28-11	43.0	24.1-96.6
45	WMCF-TV	Montgomery, AL	32-24-11 86-11-48	135.1	24.1-96.6
46	None within 130 km		--	--	9.7-88.5
47	New	Hattiesburg, AL	31-21-02 89-22-12	373.7	244.6
48	WAFF	Huntsville, AL	34-42-39 86-37-07	123.0	9.7-88.5
49	None within 130 km		--	--	24.1-96.6
50	None within 130 km		--	--	24.1-96.6
51	None within 130 km		--	--	24.1-96.6
54	WZDX	Huntsville, AL	34-38-11 86-30-42	114.5	24.1-96.6

<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.

<sup>2</sup>Modified CP Site.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II  
DTV ALLOCATION SITUATION  
FOR THE PROPOSED DTV CHANNEL 47 OPERATION OF  
WJSU-TV, ANNISTON, ALABAMA  
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623 <sup>1</sup> km
DTV					
47	WJSU-TV	Anniston, AL	33-36-24 <sup>2</sup> 86-25-03	--	--
46	WMCF-TV	Montgomery, AL	32-24-11 86-11-48	135.1	32.2-88.5
47	WDEF-TV	Chattanooga, TN	35-08-06 85-19-25	197.1	223.7
47	WTVM	Columbus, GA	32-19-25 84-46-46	209.0	223.7
48	None within 125 km		--	--	32.2-88.5

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<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.

<sup>2</sup>Modified CP Site.

## **EXHIBIT 5**

**ENGINEERING STATEMENT  
RE REQUEST FOR CHANGE  
IN DTV CHANNEL ALLOTMENT  
WCIV(TV), CHARLESTON, SOUTH CAROLINA**

**AUGUST 1997**

**COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.**

This engineering statement has been prepared on behalf of First Charleston Corporation, licensee of TV station WCIV(TV), Charleston, South Carolina in support of its request for a DTV channel which is part of the Commission's core spectrum for digital television operation. At present, station WCIV(TV) is licensed to operate on analog NTSC Channel 4 (66-72 MHz) with 100 kW effective radiated power (ERP) and 597 meters antenna height above average terrain (HAAT).

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station WCIV(TV) was allotted UHF Channel 53 with 1000 kW ERP and 597 meters antenna height for its DTV operation.

In Sixth Report and Order, the Commission also indicated that the core spectrum for DTV operation would be either TV channels 2-46 or channels 7-51. The Commission stated that it will monitor the testing and early implementation of DTV systems to decide the final core spectrum for the digital TV operation. The proposed DTV Channel 53 allotted to WCIV(TV) falls outside the core spectrum being considered for DTV operation. Therefore, WCIV(TV) requests the Commission to allot the station a DTV channel which is part of its core spectrum plan so that its DTV operation does not require a change in frequency after the transition period.

An engineering study was conducted to determine another suitable DTV channel, located in the core-spectrum, which would not result in predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The study indicates UHF Channel 42 (638-644 MHz) can be allotted to WCIV(TV) in lieu of Channel 53 for its DTV operation. The attached Tables I and II list the pertinent analog TV stations and DTV allotments, respectively, which were considered for the allotment of DTV Channel 42 to WCIV(TV). These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed DTV Channel 42 operation at the WCIV(TV) licensed site.

The nearest co-channel analog NTSC station (WTVI) is located 277.7 kilometers from the licensed WCIV(TV) site. Station WTVI(TV) is licensed to Charlotte, North Carolina and currently operates with 2750 kW ERP and 590 meters HAAT. WTVI(TV) holds a construction permit (BPET-941013KF) to reduce its power to 1380 kW. The station has also filed an application (BMPET-960510KE) to increase ERP to 5000 kW. The nearest co-channel DTV allotment is for station WJBF, Augusta, Georgia which is located 206.5 kilometers from the WCIV(TV) site.

Although some interference is predicted to existing analog TV operations and the proposed DTV allotments, it is believed that such predicted interference falls within the acceptable range of the DTV allotment process. The Commission itself has allotted DTV channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of WCIV(TV), was not considered excessive.

August 22, 1997

Respectfully submitted,



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COHEN, DIPPELL AND EVERIST, P. C.

**TABLE I**  
**ANALOG NTSC TV ALLOCATION SITUATION**  
**FOR THE PROPOSED DTV CHANNEL 42 OPERATION OF**  
**WCIV(TV), CHARLESTON, SOUTH CAROLINA**  
**AUGUST 1997**

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Geographic Coordinates</u>	<u>Distance</u>	
				<u>Actual km</u>	<u>Section 73.623<sup>1</sup> km</u>
<u>DTV</u>					
42	WCIV	Charleston, SC	32-55-28 <sup>2</sup> 79-41-58	--	--
<u>ANALOG</u>					
27	WRJA-TV	Sumter, SC	33-52-52 80-16-14	118.7	24.1-80.5
28	WTGS	Hardeeville, SC	32-02-48 81-20-27	182.4	24.1-80.5
34	WUBI	Baxley, GA	31-45-53 82-13-38	270.5	24.1-80.5
35	WRLK-TV	Columbia, SC	34-07-07 80-56-12	175.4	24.1-80.5
38	WNEH	Greenwood, SC	34-22-21 82-10-03	279.7	24.1-80.5
39	WUNJ-TV	Wilmington, NC	34-07-51 78-11-16	194.0	24.1-80.5
40	WKFT	Fayetteville, NC	35-30-45 78-58-40	294.7	24.1-80.5
41	New	Georgetown, SC	33-25-58 79-16-16	69.1	9.7-88.5
42	WTVI	Charlotte, NC	35-17-14 80-41-45	277.7	244.6
43	WFXB	Myrtle Beach, SC	33-50-10 78-51-08	128.2	9.7-88.5
44	New	Aiken, SC	33-41-10 81-55-43	224.1	24.1-80.5
45	None within 200 km		--	--	24.1-80.5
46	None within 200 km		--	--	24.1-80.5
49	WRET-TV	Spartanburg, SC	34-53-09 81-49-15	293.0	24.1-80.5
50	None within 200 km		--	--	24.1-80.5

<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.

<sup>2</sup>Licensed WCIV(TV) Site.



COHEN, DIPPELL AND EVERIST, P. C.

TABLE II  
DTV ALLOCATION SITUATION  
FOR THE PROPOSED DTV CHANNEL 42 OPERATION OF  
WCIV(TV), CHARLESTON, SOUTH CAROLINA  
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Geographic Coordinates</u>	<u>Distance</u>	
				<u>Actual km</u>	<u>Section 73.623<sup>1</sup> km</u>
<u>DTV</u>					
42	WCIV	Charleston, SC	32-55-28 79-41-58	--	--
41	None within 130 km		--	--	32.2-88.5
42	WJBF	August, GA	33-24-15 81-50-19	--	223.7
43	None within 130 km		--	--	32.2-88.5

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<sup>1</sup>Minimum required distances or prohibited distance brackets for future DTV allotments.